



**U.S. Department of Energy**  
**Office of River Protection**

**P.O. Box 450**  
**Richland, Washington 99352**

02-OSR-0502

Mr. R. F. Naventi, Project Manager  
Bechtel National, Inc.  
3000 George Washington Way  
Richland, Washington 99352

Dear Mr. Naventi:

CONTRACT NO. DE-AC27-01RV14136 – APPROVAL OF BECHTEL NATIONAL, INC. (BNI) AUTHORIZATION BASIS CHANGE NOTICES (ABCN) ABCN-24590-01-00008, REVISION 0 AND REVISION 2, APPROVING THE INTEGRATED SAFETY MANAGEMENT PLAN (ISMP) FOR LOW ACTIVITY WASTE (LAW) AND HIGH LEVEL WASTE (HLW) FULL FACILITY CONSTRUCTION

- References:
1. BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmitted for Approval: Contract Deliverable, Revised Standards Approval Package, and Associated Authorization Basis Change Notice ABCN-24590-01-00008, Revision 0, 'ISMP Standards Approval Package Submittal'," CCN: 023021, dated September 17, 2001.
  2. BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmittal for Approval: Revision 1 to Contract Deliverable, Revised Standards Approval Package Associated with Authorization Basis Change Notice ABCN-24590-01-00008, Revision 0, 'ISMP Standards Approval Package Submittal'," CCN: 027628, dated February 5, 2002.
  3. BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmittal for Approval: Authorization Basis Change Notice ABCN-24590-01-00008, Revision 2, Integrated Safety Management Plan (ISMP) Standards Approval Package (SAP) Submittal, CCN: 038759, dated August 22, 2002.
  4. ORP letter from R. C. Barr to R. F. Naventi, BNI, "Office of Safety Regulation (OSR) Questions on the Revised Integrated Safety Management Plan," 01-OSR-0408, dated October 19, 2001.
  5. BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmittal for Use: Response to Office of Safety Regulation (OSR) Questions on Proposed Revision to the Integrated Safety Management Plan; ABCN-224590-01-00008," CCN: 025088, dated November 16, 2001.
  6. ORP letter from R. C. Barr to R. F. Naventi, BNI, "Office of Safety Regulation Partial Approval of Bechtel National, Inc. (BNI) Authorization Basis Change Notice, 24590-01-00008, Revision 1, 'ISMP Standards Approval Package Submittal'," 02-OSR-0136, dated April 1, 2002.

Mr. R. F. Naventi  
02-OSR-0502

Based upon an evaluation of ABCN-24590-01-00008, Revision 0 and Revision 2, submitted in References 1, 2 and 3, respectively, the U.S. Department of Energy, Office of River Protection (ORP) has found the proposed changes acceptable. The ORP has concluded that there is reasonable assurance that the health and safety of the public, the workers, and the environment will not be adversely affected by those changes, and that they comply with applicable laws, regulations, and River Protection Project Waste Treatment and Immobilization Plant contractual requirements. The following paragraphs present the chronology of this ABCN request.

Revision 1 and Revision 2 are not "revisions" to the previous documents, but are supplements to Revision 0. This ABCN consists of clarifications and/or editorial changes to the ISMP. (With the approval of these changes, the resulting ISMP is approved for full LAW and HLW facility construction and will be part of the Authorization Basis.) During the review of Revision 0, ORP requested BNI to provide additional supporting information (Reference 4). BNI responded to this request by providing supplemental information for the ABCN, initially in Revision 1 and later in Revision 2. Also, BNI provided specific answers to ORP questions in Reference 5. Revision 1 retracted certain changes proposed in Revision 0 and also modified changes resulting from ORP questions involving areas where expedited approval was being requested. Revision 2 revised proposed changes of Revision 0 resulting from ORP questions that did not involve areas associated with the expedited approval request.

The changes proposed in ABCN-24590-01-00008, Revision 1, were approved on April 1, 2002, (Reference 6). In addition, some of the proposed changes contained in ABCN-24590-01-00008, Revision 0, were submitted in duplication with other ABCNs because they related to the subject matter of those ABCNs. The other ABCNs which contained duplicative ISMP changes with this ABCN are ABCN 24590-WTP-ABCN-ESH-01-011, ABCN 24590-WTP-ABCN-ESH-02-001, and 24590-WTP-ABCN-ESH-02-002. These duplicative ISMP changes were approved in actions associated with these other ABCNs. The Safety Evaluation Report attached only addresses the changes not approved in actions associated with the other ABCNs and those not already approved in the response to the request for early approval of certain items in Revision 1 of this ABCN.

As part of the amendment implementation process, please submit within 14 days of receipt of this letter the revised pages of the ISMP, identifying all revisions to date. This amendment is effective immediately and shall be fully implemented within 30 days; i.e., the provisions of the amendment may be used immediately; within 30 days, controlled copies of the ISMP, and any applicable subordinate documents must be modified to reflect the changes associated with this amendment.

If you have any questions, please contact me, or your staff may call Walt Pasciak, Office of Safety Regulation, (509) 373-9189.

Sincerely,

Roy J. Schepens  
Manager

OSR:WJP

Attachment

**Safety Evaluation Report (SER)  
of Proposed Authorization Basis Change Notice (ABCN)  
ABCN-24590-01-00008, Revision 0 and Revision 2  
to the Integrated Safety Management Plan (ISMP)  
for the River Protection Project-Waste Treatment Plant (WTP)**

## **1.0 INTRODUCTION**

The WTP authorization basis is the composite of information, provided by the Contractor in response to radiological, nuclear, and process safety requirements, that is the basis on which the Manager, Office of River Protection (ORP) grants permission to perform regulated activities. The authorization basis includes that information requested by the Contractor for inclusion in the authorization basis and subsequently accepted by ORP. The authorization basis for the WTP includes the ISMP. This SER documents ORP's evaluation of the changes proposed by the Contractor.

The U.S. Department of Energy, ORP has reviewed ABCN ABCN-24590-01-00008, Revision 0, 1 and 2, submitted to ORP by letters dated September 17, 2001,<sup>1</sup> February 5, 2002<sup>2</sup> and August 22, 2002,<sup>3</sup> respectively. It should be noted that Revision 1 and 2 are not "revisions" to the previous documents, but are supplements to Revision 0. This ABCN consists of clarifications and/or editorial changes to the Integrated Safety Management Plan (ISMP). During the review of Revision 0, ORP requested BNI to provide additional supporting information in its letter dated October 19, 2001.<sup>4</sup> BNI responded to this request by revising the ABCN, initially in Revision 1 and later in Revision 2. Also, BNI provided specific answers to ORP questions in its letter dated November 16, 2001.<sup>5</sup> Revision 1 retracted certain changes proposed in Revision 0 and also modified changes resulting from ORP questions involving areas where expedited approval was being requested. Revision 2 revised proposed changes of Revision 0 resulting from ORP questions that did not involve areas associated with the expedited approval request.

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<sup>1</sup> BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmitted for Approval: Contract Deliverable, Revised Standards Approval Package, and Associated Authorization Basis Change Notice ABCN-24590-01-00008, Revision 0, 'ISMP Standards Approval Package Submittal'," CCN: 023021, dated September 17, 2001.

<sup>2</sup> BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmittal for Approval: Revision 1 to Contract Deliverable, Revised Standards Approval Package Associated with Authorization Basis Change Notice ABCN-24590-01-00008, Revision 0, 'ISMP Standards Approval Package Submittal'," CCN: 027628, dated February 5, 2002.

<sup>3</sup> BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmittal for Approval: Authorization Basis Change Notice ABCN-24590-01-00008, Revision 2, 'Integrated Safety Management Plan (ISMP) Standards Approval Package (SAP) Submittal'," CCN: 038759, dated August 22, 2002.

<sup>4</sup> ORP letter from R. C. Barr to R. F. Naventi, BNI, "Office of Safety Regulation (OSR) Questions on the Revised Integrated Safety Management Plan," 01-OSR-0408, dated October 19, 2001.

<sup>5</sup> BNI letter from A. R. Veirup to M. K. Barrett, ORP, "Transmittal for Use: Response to Office of Safety Regulation (OSR) Questions on Proposed Revision to the Integrated Safety Management Plan; ABCN-24590-01-00008," CCN: 025088, dated November 16, 2001.

Some changes proposed in ABCN-24590-01-00008, Revision 1, were approved on April 1, 2002,<sup>6</sup> in response to BNI's request for early approval of certain items. In addition, some of the proposed changes contained in this ABCN were also submitted in duplication with other ABCNs because they related to the subject matter of those ABCNs. The other ABCNs which contained duplicative ISMP changes with this ABCN are ABCN 24590-WTP-ABCN-ESH-01-011, ABCN 24590-WTP-ABCN-ESH-02-001, and 24590-WTP-ABCN-ESH-02-002. These duplicative ISMP changes were approved in actions associated with the other ABCNs. This evaluation only addresses the changes not approved in actions associated with other ABCNs and those not already approved in the approval of the early request items of Revision 1 to this ABCN.

## **2.0 BACKGROUND**

The ISMP contains the safety management practices developed specifically for the project in the areas of design, construction, commissioning, and operation. The management practices ensure implementation of the corporate policy that no activities are more important than protecting the health and safety of workers, the public, and the environment. The ISMP documents the process used to incorporate laws, regulations, and standards applicable to the nuclear, radiological, and process safety aspects of the project into programs for facility design, construction, commissioning, and operation. At this stage of the project, the ISMP reflects largely information relevant to design and construction.

The evaluation of the proposed changes to the ISMP is documented below.

## **3.0 EVALUATION**

### Description of Changes:

The proposed changes are clarifications and/or editorial changes. Because there are so many changes, ORP has prepared the attached table, identifying the applicable revisions, the sections, a brief description of the clarification and/or editorial change, and the basis for approval of the changes.

### Evaluation: (Acceptable)

The proposed clarifications and/or editorial changes are acceptable because they improve the overall content of the ISMP. The clarifications are necessary to correct or update references, to delete references that are no longer applicable, and to reflect current terminology. The editorial changes enhance the readability of the ISMP. The proposed changes do not reduce the effectiveness of the ISMP, nor are the proposed changes a reduction in Contractor commitment to Integrated Safety Management.

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<sup>6</sup> ORP letter from R. C. Barr to R. F. Naventi, BNI, "Office of Safety Regulation Partial Approval of Bechtel National, Inc. (BNI) Authorization Basis Change Notice, 24590-01-00008, Revision 1, 'ISMP Standards Approval Package Submittal'," 02-OSR-0136, dated April 1, 2002.

#### **4.0 CONCLUSION**

Based on this evaluation of the proposed changes, ORP has found the proposed changes to be acceptable, and has concluded that there is reasonable assurance that the health and safety of the public, the workers, and the environment will not be adversely affected by the proposed changes. Furthermore, ORP has determined that the proposed changes comply with applicable laws, regulations, and WTP contractual requirements.

Attachment: Evaluation Table

**Evaluation Table  
of Authorization Basis Change Notice (ABCN)  
ABCN-24590-01-00008, Revision 0, 1 and 2<sup>1</sup>  
to the Integrated Safety Management Plan (ISMP)  
for the River Protection Project-Waste Treatment Plant (WTP)**

<b>ISMP Section</b>	<b>Rev</b>	<b>Summary Description of Change</b>	<b>Type<sup>2</sup></b>	<b>OSR Evaluation of Change</b>
<b>Section 1.0 Changes</b>				
Table of Contents	0	Change Section 1.0 title to read, “Project Integrated Safety Management Approach”	E	This change is acceptable in that it is an editorial change to make the Table of Contents consistent with the title of Section 1.0.
Table of Contents	2	Change Section 2.2 title to read, “Compliance with 10 CFR 830, Nuclear Safety Management”	E	This change is acceptable in that it is an editorial change to make the Table of Contents consistent with the title of Section 2.2.
Table of Contents	0	Change Section 2.5 title to read, “Compliance with 10 CFR 820, “Procedural Rules for DOE Nuclear Activities””	E	This change is acceptable in that it is an editorial change to make the Table of Contents consistent with the title of Section 2.5.
Table of Contents	0	Delete, (QAP) at the end of the Section 3.5 title	E	This change is acceptable in that it is an editorial change to make the Table of Contents consistent with the title of Section 3.5.
Table of Contents	0	Change Section 4.2.3 title to read, “Tailoring of Documentation Related to Safety”	E	This change is acceptable in that it is an editorial change to make the Table of Contents consistent with the title of Section 4.2.3.
Table of Contents	0	Delete listings of Figures 1-2 and 1-3	E	This change is acceptable in that it is an editorial change to make the Table of Contents consistent with Section 1.3.7 and Section 1.3.8 text, respectively.
Table of Contents	0	Delete listing of Table 1-2	E	This change is acceptable in that it is an editorial change to make the Table of Contents consistent with Section 1.3.7 text.
1.0	0	Change Section 1.0 title to read, “Project Integrated Safety Management Approach”	C	This change is acceptable in that it clarifies BNI’s approach as a Project integrated safety management approach.

<sup>1</sup> Note that Revision 1 and 2 are not “revisions” to the previous documents, but are supplements to Revision 0. Revision 1 proposed to retract certain changes proposed in Revision 0 and also modified changes proposed in Revision 0 resulting from ORP questions involving areas where expedited approval was being requested. Action on items involving the expedited approval request of Revision 1 has been taken separately, and as a result, no changes specific to Revision 1 appear on this table. Revision 2 included changes resulting from ORP questions that did not involve areas associated with the Revision 1 expedited approval request.

<sup>2</sup> E = editorial change; C = clarification change.

ISMP Section	Rev	Summary Description of Change	Type <sup>2</sup>	OSR Evaluation of Change
1.0	0	Add text to reflect the radiological, nuclear, and process safety focus of the ISMP; Delete reference to Part B of the Project; Add commissioning to the list of project phases	C	This change is acceptable in that it clarifies the scope of the ISMP to address radiological, nuclear, and process safety; specifies that the ISMP will be further developed during the phases of the Project; and adds commissioning to the list of phases of the Project.
1.1	0	Add commissioning to the list of project phases; Change Part B to the later phases of the project; Several editorial changes throughout	C, E	These changes are acceptable because they are consistent with previously acceptable changes. The editorial changes are acceptable because they improve the readability of the ISMP.
1.2	0	Several editorial, including verb tense, changes; Include DOE best practices; Add commissioning to the list of project phases; Clarify use of PSM if appropriate	C, E	These changes are acceptable because they are consistent with previously acceptable changes, include the use of DOE best practices, and clarify the use of PSM if appropriate. The editorial changes are acceptable because they improve the readability of the ISMP.
Figure 1-1	0	Revise center bottom diamond text to read, “SRD EXPOSURE. STDS AND RISK GOALS MET?”	C	This change is acceptable because it clarifies that both SRD exposure standards and risk goals being met are used to assess whether adequate safety is achieved.
1.2	0	Delete text describing approach to safety analysis similarity to draft NUREG-1513	C	This change is acceptable because the approach described is not explicitly used in the Project approach and it is not a required AB commitment.
1.3.1	0	Change first sentence to read, “The Project safety approach began with an understanding of the work....”	C	This change is acceptable because it clarifies that the Project safety approach began with an understanding of the work.
1.3.2	0	Delete the words “U.S.” and “United Kingdom (UK)”	C	This change is acceptable because additional resources for the identification of standards were derived from commercial nuclear and chemical industries. Note: The previous BNFL related approach does not apply to the DC&C contract.
1.3.3	0	Add text on radiological, nuclear, and process safety to scope of the ISMP; Add commissioning phase of the project to the hazards assessment scope; Specify ISMP applies to Contractors and Subcontractors; Editorial verb tense changes	C, E	These changes are acceptable because they are consistent with previously acceptable changes and clarify the scope of ISMP document coverage. The editorial changes are acceptable because they improve the readability of the ISMP.
1.3.4	0	Add the words, best practices, lessons learned, corporate knowledge, and the experience gained; Add the words, or exacerbate	C	The first clarification is acceptable because it reflects other sources of information used to enhance the PHA process. The second clarification is acceptable because it clarifies the response to factors contributing to the impact of accidents.
1.3.6	2	Add reference to NRC 1998 in the ISMP.	C	Prior to Revision 0, the ISMP contained reference to NRC 1988, Nuclear Fuel Cycle Accident Analysis Handbook, NUREG-1320. Revision 0 proposed to delete this reference. Revision 2 proposed to reinstate this reference, and add reference to NRC 1998, Nuclear Fuel Cycle Accident Analysis Handbook, NUREG/CR-6410. This proposed change is acceptable because it adds useful reference information.

<b>ISMP Section</b>	<b>Rev</b>	<b>Summary Description of Change</b>	<b>Type<sup>2</sup></b>	<b>OSR Evaluation of Change</b>
1.3.7	0	Add text to provide references to the SRD for equivalent information furnished in SRD, section 2 and appendix D	C	This clarification is acceptable because the SRD provides the same information and reference to the SRD for the information is appropriate.
Table 1-2	0	Delete Table 1-2	C	This change is acceptable because the SRD provides the same information and reference to the SRD for the information is appropriate.
Figure 1-2	0	Delete Figure 1-2	C	This change is acceptable because the SRD provides the same information and reference to the SRD for the information is appropriate.
1.3.8	0	Add text to provide references to the SRD for equivalent information furnished in SRD, section 2 and appendix D	C	This clarification is acceptable because the SRD provides the same information and reference to the SRD for the information is appropriate.
Figure 1-3	0	Delete Figure 1-3	C	This change is acceptable because the SRD provides the same information and reference to the SRD for the information is appropriate.
1.3.9	0	Change “quality assurance program (QAP)” to “quality assurance (QA) program” and make resulting changes throughout section; add statement that QAM reflects compliance with 10 CFR 830, Subpart A; and add to goal “safe design, construction, commissioning, and deactivation”; editorial changes	C, E	These changes are acceptable because they reflect the use of the QA program, clarify compliance with 10 CFR 830, Subpart A, and add the additional phases of the Project to the safety goal. The editorial changes make the ISMP more readable and consistent.
1.3.10	0	Add text for SDC and SDS defined in the SRD SC 1.0-8; delete existing definitions; add text for Appendix A of the SRD Volume II; delete SDC and SDS discussions; removed references to initial ISAR; change “in Part B” to “during Project design and safety analysis”; add statement that Engineering procedures describe the requirements associated with designation of Quality Level requirements (two places); add specific to attribute 4; and delete attribute 5	C, E	These changes are acceptable because providing reference to the SRD eliminates the possibility of inconsistencies; the reference to the ISAR is superseded by the PSAR Volume I, Chapter 3, Section 3.8; Part B has been clarified to mean during Project design and safety analysis; it is appropriate that Engineering procedures describe Quality Levels; and item 5 in the list of attributes is an unnecessary example after specific has been added to item 4. The editorial changes are acceptable because they improve the overall readability of the ISMP and provide consistency.
1.3.11	0	Revise text to make clear that Quality Levels of the Project and their applications are described in related Engineering procedures.	C	This change is acceptable because it makes clear that Engineering procedures describe the Project quality levels and their applications.
1.3.12	0	Include “the commissioning phase” in two places; revise text on impact of training for items 1 and 2; and delete reference to ISAR.	C	These changes are acceptable because they clarifies that training is also important for safety during the commissioning phase; they include QAM compliance and good business practices; the reference to the ISAR is superseded by the PSAR Volume I, Chapter 12, Section 12.4 discussion on WTP training.



<b>ISMP Section</b>	<b>Rev</b>	<b>Summary Description of Change</b>	<b>Type<sup>2</sup></b>	<b>OSR Evaluation of Change</b>
1.3.13	0	Add “commissioning” to the Project phases; add a new item 3) Construction Activities; renumber remaining items 4) through 7); delete reference to ISAR	C, E	These changes are acceptable because commissioning is a Project phase; construction activities need to be covered by procedures; and the reference to the ISAR is superseded by the PSAR Volume I, Chapter 12, Section 12.3 discussion on WTP procedures. The editorial changes are acceptable and necessary for renumbering.
1.3.14	0	Change “startup testing”, and “startup”, to “commissioning” throughout this section; delete reference to ISAR	C, E	The editorial changes to startup testing, and startup, are acceptable because they match current project terminology. The deletion of the reference to the ISAR is acceptable because it has been superseded by the PSAR Volume I, Chapter 10, Section 10.3 discussion on WTP commissioning.
1.3.15	0	Change “testing” to “commissioning”; delete reference to ISAR 3.11; delete reference to ISAR 3.0; delete reference to ISAR 3.10.1; and editorial changes for consistency with Project terminology	C, E	The editorial changes are acceptable because they make the text consistent with current project terminology. The deletion of the references to ISAR 3.11 and ISAR 3.0 is acceptable because the references are superseded by the PSAR Volume I, Chapter 11, Section 11.3 discussion on WTP conduct of operations. The deletion of the reference to ISAR 3.10.1 is acceptable because the reference is superseded by the PSAR Volume I, Chapter 10, Section 10.3 discussion on WTP commissioning.
1.3.16	0	Include assumptions in documentation requirements, refer to Design Change Notices in description of CM program requirements, delete sentence indicating that ES&H would be the organization most likely to identify new regulations, indicate that the facility manager approves certain changes during commissioning, and specify when qualification requirements are established.	C, E	This change is acceptable because it clarifies that the Project safety approach began with an understanding of the work. The editorial changes are acceptable because they make the text consistent with current project terminology.
1.3.17	0	Change “startup testing” to “commissioning”; delete reference to ISAR 3.7	C, E	This editorial change is acceptable because it makes the text consistent with current project terminology. The deletion of the reference to ISAR 3.7 is acceptable because the reference is superseded by the PSAR Volume I, Chapter 11, Section 11.3.6 discussion on WTP investigation of abnormal events, and Chapter 17, Section 17.4.7 on WTP occurrence reporting.
1.3.18	0	Change “state and federal emergency preparedness” to “construction emergency response”; change “Part B” to “detailed design and construction”; delete reference to ISAR 9.0	C, E	The editorial changes are acceptable because they make the text consistent with current project terminology. The deletion of the reference to ISAR 9.0 is acceptable because the reference is superseded by the PSAR Volume I, Chapter 15, discussion on WTP emergency preparedness.
1.3.19	0	Delete the first three words of the first sentence; add the word draft before the word deactivation; and add the words start of full before the word construction	C	These clarifications are acceptable because they reflect the current project approach and required deliverable timing.

ISMP Section	Rev	Summary Description of Change	Type <sup>2</sup>	OSR Evaluation of Change
Section 2.0 Changes				
2.0	0	Change 10 CFR 830.120 to 10 CFR 830, Subpart A; change the title of Section 2.2 to Compliance with 10 CFR 830, Nuclear Safety Management	C, E	These changes are acceptable because they clarify the current version of 10 CFR 830 is applicable to the Project.
2.1	0	Change “laws and regulations” to “top-level requirements”; editorial change; delete reference to ISAR 3.1	C, E	This change is acceptable because it clarifies top-level requirements (e.g., in this case, RL/REG-96-0006) drive the CM Program, rather than laws and regulations. The editorial change (a period to a colon) is acceptable. The deletion of the reference to ISAR 3.1 is acceptable because the reference is superseded by the PSAR Volume I, Chapter 17, Section 17.4.3 on WTP configuration management and the updated section 1.3.16 of the ISMP that details the current WTP Project Configuration Management Program (as added to the ISMP by 24590-WTP-ABCN-ESH-01-011 to incorporate elements of the Project CM Plan).
2.2	0	Replace “10 CFR 830.120, Quality Assurance Requirements” with “10 CFR 830, Subpart A, Quality Assurance”; change QAP to QA Program in several locations; replace QAP with QAM in one location; add document after QAP in several locations; add discussion for 10 CFR 830, Subpart B	C	These changes are acceptable because they clarify the current version of 10 CFR 830 is applicable to the Project; they provide consistency throughout the section; they clarify historical information on QAP document and the distinction between the program and implementing document where required; they define the requirements for implementation of 10 CFR 830, Subpart B, Safety Basis Requirements.
2.2	2	Change title to “Compliance with 10 CFR 830 Nuclear Safety Management”; add new first paragraph to explain compliance to 10 CFR 830 Subpart A and Subpart B; add sentence explaining the QAPD. Add requirements for establishing and maintaining the nuclear safety basis from 10 CFR 830, Subpart b, and include specific requirements in the ISMP.	C	These changes are acceptable because they clarify the current version of 10 CFR 830 is applicable to the Project; they provide consistency throughout the section; they clarify historical information on QAP document and the distinction between the program and implementing document where required; they define the requirements for implementation of 10 CFR 830, Subpart B, Safety Basis Requirements.
2.3	0	Add (RPP) after radiation protection program	E	This editorial change is acceptable because it provides the acronym for radiation protection program for use in later subsections.
2.3.1	0	Change “BNI” to “The RPP-WTP” in first paragraph; add document after RPP in first and last paragraphs.	C	Changing BNI to The RPP-WTP is acceptable because the RPP-WTP will be in full compliance versus the Contractor; adding document after RPP is acceptable because it makes it clear that it is discussed in the RPP document versus the radiation protection program and that updating the document versus the program is discussed in the ISMP.
2.3.3	0	Add “document” after RPP; change “QAP” to “QA program”; change “Part B” to “detailed”; revise verb tense	C, E	These changes are acceptable because they are consistent with similar changes already found acceptable and show the correct historical perspective.

ISMP Section	Rev	Summary Description of Change	Type <sup>2</sup>	OSR Evaluation of Change
2.4	0	Delete reference to the ISAR Appendix 5B	C, E	The deletion of the reference to ISAR Appendix 5B is acceptable because the reference is superseded by the PSAR Volume I, Chapter 9, Section 9.7 that addresses the draft Environmental Radiation Protection Plan. Note: Section 2.4 references the SRD Volume II, Section 5.3.1, Environmental Radiological Monitoring, but the correct reference should be the SRD Volume II, Section 5.4, Environmental Radiological Monitoring. This is an editorial change and is acceptable.
2.5	0	Change title to “Compliance with 10 CFR 820, Procedural Rules for DOE Nuclear Activities”; delete “Part B”	C	The title change is acceptable because it corrects the title. Deleting Part B is acceptable because it is no longer an important reference point in the ISMP and is consistent with other ISMP changes deleting Part B reference.
Section 3.0 Changes				
3.0	0	Correct title for ISMP Section 4.1.1 to match actual title of that section as Development of Safety Management Processes	E	This change is acceptable because it is an editorial update to reflect the actual title of Section 4.1.1.
3.1.1	0	Add “training and qualification of project personnel in emergency response,” after controls in eighth paragraph; add “or when the melter area shield door is open”, at the end of the 10 <sup>th</sup> paragraph; add “as prescribed by RL/REG-2000-08 (DOE 2000a)”, after analyses in 13th paragraph; change “unnecessary” to “over-conservative” in 13th paragraph; provided as Appendix B in the SRD Volume II	C	These changes are acceptable because they better define the scope of emergency preparedness; they better define the engineering features for radiation protection; and they define the regulatory requirements for performing risk analysis; they emphasize consideration of controls; and they clarify the role of SRD Appendix B.
3.2	0	Revise first paragraph on overall general roles, responsibilities, and authorities; verb tense changes in last paragraph; add Part A before HAR in last paragraph	C, E	These changes are acceptable because they clarify that the QAM provides overall Project responsibilities and the responsibilities specifically related to radiological, nuclear, and process safety are provided in the ISMP Chapter 11; they specify the historical Part A version of the HAR. The verb tense changes are acceptable editorial changes.
3.3	0	Add “related to radiological, nuclear, and process safety” at the end of this section	C	This change is acceptable because it provides clarification to the AB discussion, noting the scope of the AB covered by the ISMP.
3.3.1	0	Add “DOE-approved,” before documentation and add “as”, after documentation; add “commissioning” in the next to last sentence	C	These changes are acceptable because they clarify that WTP Project Authorization Basis documentation is approved by the DOE; and that an AB is applicable during the commissioning period.
3.3.1.1	0	Add “DOE-approved” before ISMP in the first sentence.	C	This change is acceptable because it clarifies that the WTP Project Authorization Basis ISMP documentation is approved by the DOE.

ISMP Section	Rev	Summary Description of Change	Type <sup>2</sup>	OSR Evaluation of Change
3.3.1.2	0	Add “DOE-approved” before Safety Requirements Document (SRD)	C	This change is acceptable because it clarifies that the WTP Project Authorization Basis ISMP documentation is approved by the DOE.
3.3.1.3	0	Add “DOE-approved” before Safety Analysis Report (SAR); second sentence, change to “... (ISAR) was developed by the Part A Contractor based...”; fourth sentence, change to read, “... (PSAR), that replaces the ISAR, will be based on the preliminary facility design.... and will demonstrate...”;additional text changes and verb tense changes in the third paragraph; additional text changes and verb tense changes in the fourth paragraph	C	These changes are acceptable because they clarify that the WTP Project Authorization Basis ISMP documentation is approved by the DOE; that historic reference in ISAR development during conceptual design of the WTP is no longer pertinent; that Privatization is not applicable; that superseding of the ISAR by the PSAR discussion of fundamental aspects of design in the facility-specific WTP PSAR volumes makes this ISAR reference no longer necessary; they clarify that the FSAR chapter number will likely change and that the update is in the future.
3.3.1.3	2	Insert new second paragraph; additional text changes and verb tense changes in the third paragraph	C	These changes are acceptable because they clarify that the WTP Project Authorization Basis ISMP documentation is approved by the DOE; that historic reference in ISAR development during conceptual design of the WTP is no longer pertinent; that Privatization is not applicable; that superseding of the ISAR by the PSAR discussion of fundamental aspects of design in the facility-specific WTP PSAR volumes makes this ISAR reference no longer necessary; they clarify that the FSAR chapter number will likely change and that the update is in the future.
3.3.1.4	2	Add “DOE-approved before TSRs” in first sentence; add “approved prior to start of operations beginning with hot commissioning” after TSRs in the second sentence; change are to will be; change “It” to “They”; delete “as necessary” in the last sentence of the first paragraph; editorial	C, E	These changes are acceptable because they clarify that the WTP Project Authorization Basis TSR documentation is approved by the DOE and that TSRs are not effective until operations beginning with hot commissioning, and also notes not all categories may be required. The editorial change is acceptable for grammatical correctness.
3.3.1.5	0	In first paragraph, first sentence, change “10 CFR 830.120 to 10 CFR 830 Subpart A”; in first paragraph, add “DOE-approved” before Quality Assurance Manual; change “QAP” to “QA Program” in several places; add “The QAM (BNI 2001) provides a description of the Project QA Program” at the end of the first paragraph; delete the remaining five paragraphs	C	These changes are acceptable because they clarify the current version of 10 CFR 830 applicable to the Project; they clarify that the WTP Project Authorization Basis QAM documentation is approved by the DOE; they avoid confusion with the historical reference to the QAP; they clarify that the WTP Project Authorization Basis QA Program documentation is provided in the QAM; the deletion removes redundant information that is provided in the QAM.
3.3.1.6	0	Revise the first sentence to read “The DOE-approved Radiation Protection Program document describes...”	C	This change is acceptable because it clarifies that there is a WTP Project Authorization Basis RPP document approved by the DOE.

<b>ISMP Section</b>	<b>Rev</b>	<b>Summary Description of Change</b>	<b>Type<sup>2</sup></b>	<b>OSR Evaluation of Change</b>
3.3.1.7	0	Add “effective during operations will” after Emergency Plan; numerous changes from “are” to “will be” throughout section; add “during operations” after emergency in last sentence of first paragraph; add “Development of the”, before Emergency in the second paragraph; change “are” to “during operations will be”, and delete last sentence in third paragraph; change “state and federal” to “construction”; change “preparedness” to “response.”	C	These changes are acceptable because they clarify this plan will be effective during operations; they remove need to update chapter number if format for PSAR changes; they specify emergency response provided during construction.
3.3.1.8	0	Add “as well as the Limited Construction Authorization Request (LCAR) and the Partial Construction Authorization Request (PCAR)” to the end of the second sentence; change third sentence to “Hazard Analysis Report (HAR) information in the SAR that constitutes bounding or significant hazards or hazardous situations is also considered to be part of the authorization basis.”	C	These changes are acceptable because they add recognition of LCAR and PCAR and incorporation of the HAR into the SAR.
3.3.2	0	Change the first two sentences to read, “The AB documents for RPP-WTP are considered configured items under Configuration Management. Changes to AB documents are managed by a configuration management program.”	C	These changes are acceptable because they clarify the relationship of Configuration Management and Authorization Basis control.
3.3.3	0	Add “using the Project procedure for AB Maintenance” to the end of the third sentence; change “QAP” to “QAM”; change “10 CFR 830.120” to “10 CFR 830 Subpart A”; add “Radiation Protection Program (RPP) document” in third paragraph; add “document” in several places after RPP in third paragraph.	C	These changes are acceptable because they clarify the use of this procedure for AB change control; they clarify the AB change process applies to the DOE approved QAM document; they clarify the current version of 10 CFR 830 applicable to the Project; they clarify changes to the WTP Project Authorization Basis RPP document are approved by the DOE.

ISMP Section	Rev	Summary Description of Change	Type <sup>2</sup>	OSR Evaluation of Change
3.4	0	Change “safety-related” to “related to safety”; revise first sentence of second paragraph to read, “To achieve safety and quality throughout design, construction, commissioning, operation, and deactivation of the facility, the WTP contractor establishes measurable goals in the areas of radiological and chemical exposure limits for the public and workers, and environmental radiological release limits”; add “and to identify the applicable training requirements” at the end of the second paragraph; change “BNI” to “WTP and WTP Contractor”; change “team” to “WTP Contractor” in the second and last paragraph;	C, E	These changes are acceptable because they update Project terminology; they clarify Clarifies that safety/quality culture is applicable during the commissioning and deactivation period; they remove the industrial health and safety of workers that is outside ISMP radiological, nuclear, and process safety scope; they clarify that environmental releases addressed in the ISMP are related to radiological releases addressed thru the ERPP; they reflect that different companies will implement the DC&C, Operations, and Deactivation; they clarify responsibility for identifying training requirements.
3.5	0	Change “QAP” to “QA Program” throughout this section; change “10 CFR 830.120” to “10 CFR 830 Subpart A”; change first sentence in second paragraph to “Integration of the QA Program into the Project safety approach began with the PHA, SRD, and HAR developed in accordance with the requirements of procedures that are developed in compliance with the QA Program”; delete reference to ISAR 9.0; replace the ISMP Section 3.3.1.5 reference with a reference to the QAM in fifth paragraph; change “QAP” to “QAM” in last sentence of the fifth paragraph	C, E	These changes are acceptable because they clarify the difference between the historical use of QAP document and the QA program; they clarify the current version of 10 CFR 830 applicable to the Project; they clarify development and application of the QA Program; deletion of the reference to ISAR 9.0 is superseded by the PSAR Volume I Chapter 15 discussion on WTP emergency preparedness; they clarify that the WTP Project Authorization Basis QA Program documentation is provided in the QAM; they remove redundant information that is provided in the QAM.
3.6.1	0	Replace reference to Table 1-2 with reference to SRD; in third paragraph replace “Technical Organization” with “Engineering”, replace “PHA team” with “ISM team”, and add “engineering and safety”; in fourth paragraph replace “philosophy” with “design” and change last sentence to, “The following is a partial list of these types of features that will be considered in design”; add “Use of” before each of the numbered items 1) through 4); add, “and minimize radiation exposure to workers,” to end of item 4); delete fifth paragraph	C	These changes are acceptable because they provide reference to the SRD which serves to eliminate duplication of information between the SRD and the ISMP; they provide the appropriate terminology used on the Project; they clarify that the examples are not a comprehensive list, but only examples and not intended to represent more than an approach; they delete information that is not necessary to the understanding of this section for normal operations, as well as remove the interface control example that has not yet been committed to in the design basis.
3.6.1	2	Delete, in support of AP 106 operations, in last paragraph	C	This change is acceptable because it clarifies the use of the Hanford site interface control process and deletes the specific reference to AP-106 operations.

ISMP Section	Rev	Summary Description of Change	Type <sup>2</sup>	OSR Evaluation of Change
3.6.2	0	Delete “normal operations and” in the second sentence; add “of remote crane systems,” after systems in item 1); change “maintenance” to “access” in item 4)	C	These changes are acceptable because they clarify an alternate material handling approach through use of remote crane systems for material transfer, as well as present these design aspects as examples that have not yet been committed to in the design basis.
3.6.3	0	Change “PHA” to “ISM process”; delete reference to ISAR 4.0; delete “the highest” and add “tailored as necessary” in the first sentence of the fourth paragraph; delete reference to ISAR 4.8; in the last paragraph, delete the first sentence, add “Important to Safety” before SSCs, replace the master equipment list with configuration management (CM) databases, and change ISMP Section 5.3 to Section 1.16.3	C	These changes are acceptable because they provide appropriate terminology; deleting the reference to ISAR 4.0 is superseded by the PSAR discussion in PSAR Volume I, Section 3.4 on Accident Analysis methodology; they clarify the use of appropriate standards (tailored as needed) by the WTP Project; deleting the reference to ISAR 4.8 is superseded by the PSAR credited SSCs discussions in the facility-specific WTP PSAR volumes Chapters 4 sections on SDC and SDS ITS SSCs (e.g., Sections 4.3 and 4.4); they clarify use of the CM databases in ITS identification and reference the appropriate ISMP section on Configuration Management.
3.7	0	Delete the second paragraph.	C	This change is acceptable because the information is not necessary for understanding of this section nor reflecting current project engineering design approach.
3.7.1	0	Add, “The risk analysis prepared at the design stage will be used during application of RAMI.” to the end of the paragraph. Note that the acronym RAMI means: Reliability, Availability, Maintainability and Inspectability.	C	This change is acceptable because it clarifies use of RAMI in risk assessment
3.7.2	0	Add “typically” after “Ventilation systems are”; add e.g., inside parentheses	C, E	This change is acceptable because it clarifies that not all ventilation systems are exhausted to atmosphere via monitored stacks. The editorial change is acceptable because it improves the readability of the ISMP.
3.8	0	Delete reference to ISAR 6.0; add item 4) General criticality safety training to all WTP staff	C	This change is acceptable because deleting the reference to ISAR 6.0 is superseded by the PSAR Volume I, Chapter 6 discussion on the WTP criticality safety program. Adding the additional item is acceptable because it clarifies the need for general criticality safety training for all WTP personnel
3.9.1.1	0	Add “unfiltered” and “normally” in the first paragraph	C	This change is acceptable because it clarifies typical design configuration.
3.9.2	0	Add “during operations” after exposure estimates	C	This change is acceptable because it clarifies activity occurs during operations.

ISMP Section	Rev	Summary Description of Change	Type <sup>2</sup>	OSR Evaluation of Change
3.10	0	Delete “activities, or” in first sentence; change “Part B” to “during detailed design, construction, and commissioning”; change “consistent” to “compliant”; add “(as applicable)” in third paragraph; delete reference to ISAR 9.0	C	These changes are acceptable because they clarify the role of emergency preparedness to support WTP operations; they replace Part B, a privatization term; they reflect a contract requirement to be compliant with the Hanford Emergency Response Plan (DOE/RL-94-02); they reflect a contract statement of work requirements for emergency preparedness; deleting the reference to ISAR 9.0 is superseded by the PSAR Volume I, Chapter 15 discussion on WTP emergency preparedness.
3.11	0	Change “a suite of company targets” to “design basis criteria”; delete second paragraph; change “occurrences of Safety Design Class or Safety Design Significant” to “ITS”.	C	These changes are acceptable because they provide the appropriate terminology; the examples deleted are not necessary for understanding of this section nor reflecting current project engineering design approach; they provide a broader definition and is consistent with SRD Safety Criterion 4.4-2.
3.13	0	Revise the definition of Maintainability; delete “Safety Design Class”; delete the last three paragraphs of text on this page (i.e., the hypothetical example)	C	These changes are acceptable because they provide a more comprehensive definition for maintainability; deleting safety design class makes the statement generic to all SSCs; deleting the example makes no impact on regulatory compliance or integrated safety programmatic requirements.
3.9.2	0	Add “during operations” after exposure estimates	C	This change is acceptable because it clarifies activity occurs during operations.
3.14	0	Revise sixth and seventh sentences in first paragraph to read, “Identifying problems early in design facilitates cost-effective design, manufacture, and fabrication. This leads to ...”; revise last sentence in first paragraph to read, “The RPP-WTP systems engineering approach for design and procurement allows the WTP design and testing approach to interface consistently with the Tank Farms”; add “as appropriate” to last sentence in fourth paragraph	C	These changes are acceptable because they provide a clearer understanding of the point to be made by the sentences; they clarify that not all interfaces need to be simulated to support testing.
3.15	0	Add “(hazard recognition)” at the end of item 3); delete the two references to ISAR 3.4	C	These changes are acceptable because they clarify the scope of the item 3) topic; deleting the references to ISAR 3.4 is superseded by the PSAR Volume I, Chapter 12, Section 12.4 discussion on WTP training.
3.16.1	0	Add last sentence to read, “Facility workers also serve as active members on other RPP-WTP safety committees”	C	This change is acceptable because it clarifies the scope of worker involvement.
3.16.1.2	0	Revise “Safety-Related” to read “related to safety” in Item 6	E	This editorial change is acceptable because it updates Project terminology.



ISMP Section	Rev	Summary Description of Change	Type <sup>2</sup>	OSR Evaluation of Change
3.16.2	0	Revise the first sentence to read, “A safety improvement program for radiological, nuclear, and process safety during operations will be developed and implemented by the PSC.”	C	This change is acceptable because it clarifies the ISMP scope and timing of this program is to be provided during operations.
3.16.3	0	Delete reference to ISAR 3.7 on Incident Investigations	C	Deleting the reference to ISAR 3.7 is superseded by the PSAR Volume I, Chapter 11, Section 11.3.6 discussion on WTP investigation of abnormal events, and Chapter 17, Section 17.4.7 on WTP occurrence reporting.
3.16.3	2	Add, “Incident investigation will be supported by the WTP Project Occurrence Reporting program, which is a related activity that also will be initiated during the Construction phase of the Project,” at the end of the first paragraph;	C	These changes are acceptable because they clarify when the Incident Investigation program will be implemented and what program supports it.
3.16.4	0	Change “Configuration Management” to “ES&H” in item 3)	C	This change is acceptable because it shows the correct responsibility.
3.16.5	2	Delete “Housekeeping (during construction, commissioning, and operations)”	C	This change is acceptable because it is an item on the list that is not necessary.
3.16.6	0	Add, “radiological, nuclear, and process,” before “safety”, and delete, “and environmental protection,” in the first sentence; add, “used during the respective Project phase(s) when they apply, after indicators”, in the last sentence in the first paragraph; change “incidents” to “occurrences” in item 8)	C	These changes are acceptable because they clarify the scope of these Performance Indicators and clarify the list of examples.
3.16.7	0	Revise the first sentence to read, “Lessons-learned includes the identification, documentation ... “	C	This change is acceptable because it clarifies the function and application of Lessons Learned as currently applied on the WTP Project.
3.16.8	0	Add “commissioning” in the last sentence in the first paragraph	C	This change is acceptable because it clarifies that feedback and trending will be provided during the commissioning phase of the WTP Project
Section 4.0 Changes				
4.1.1	0	Change TWRS-P Privatization Project to Safety Requirements Document	C, E	This change is acceptable because the WTP Project is no longer a Privatization project and referring to the SRD is appropriate.

ISMP Section	Rev	Summary Description of Change	Type <sup>2</sup>	OSR Evaluation of Change
4.1.1	2	Change “In Part B” to “During Construction”; change “written” to “finalized”; add “developed during the design, construction, and decommissioning phases of the WTP Project”; add “final versions of operational”	C, E	This change because changing Part B is consistent with the deletion of “Part B” as a reference point. The final changes are acceptable because they clarify when types of policies and procedures will be identified, rather than an explicit list of the documentation.
Figure 4-1	0	Change “Regulatory Basis” to “Regulatory Basis Identification”; change “Authorization Basis” to “Authorization Basis Definition”; move “SRD” to “after Implementation of”; change “Operational Readiness Review” to “Readiness Assessment”; Move “SRD” in Facility Implementation row boxes to after ‘Implementation of’ Replace “Operational Readiness Review” with “Readiness Assessment” in Initial Confirmation and Approval row.	C	These changes are acceptable because they provide a better definition of these safety management processes; they clarify that this implementation is based on SRD requirements, but is not done by implementation of the entire SRD; and they clarify that confirmation and approval is by the more generic term readiness assessment that can include ORRs or other methods.
4.1.2.3	0	Delete the second sentence; begin the last sentence with “The safety criteria of this program”	C	Deleting the second sentence is acceptable because it relates to the environmental radiation protection program (ERPP), which is a separate program from the radiation protection program and doesn’t need to be discussed in this section; the ERPP is described in ISMP Section 2.4. Beginning the last sentence with the proposed change is acceptable because it is defining the SRD as to where the safety criteria are presented.
4.1.2.4	0	Change “Commissioning Program” to “Startup Program”	C	This change is acceptable because this section specifically addresses the scope of the Startup Program.
4.1.2.6	0	Add “implemented by the Deactivation Contractor after Program”; add “SRD Volume II, Appendix F and its title” at the end of the last sentence	C	These changes are acceptable because they clarifies the contractor for this work and identifies information on Deactivation and Decommissioning is provided in the SRD Volume II, Appendix F.
4.1.3	0	Add “in the SRD are” after standards and change “are” to “as”; delete the sentence starting with “Design Guides”; delete “All of” at the beginning of the last sentence of the third paragraph	C, E	This change is acceptable because it defines the consensus codes and standards in the SRD used in the design and linked to the Safety Criteria. Deleting the text on design guides is acceptable because the Project is redefining the use of Design Guides. The editorial changes are acceptable because they improve the readability of the ISMP.
4.1.4	0	Change “BNI project” to “Project” and add “and subcontractors”; delete “biannual”; change “This biannual review” to “These SRD revisions”.	C	These changes are acceptable because they clarify the applicability of the SRD to all personnel supporting the Project; and they reflect the project practice of continual SRD maintenance of AB documents, in compliance with DOE/RL-96-00006 and conformance with RL/REG-97-13.

ISMP Section	Rev	Summary Description of Change	Type <sup>2</sup>	OSR Evaluation of Change
Figure 4-2	0	Change “830.120” to “830 Subpart A”; delete “Quality Assurance”; change “Design Guides” to “Design Input Memorandums (DIMs) and Other Engineering Documentation”; delete the bottom box on Engineering Documents	C	These changes to Figure 4-2 are acceptable because they make the figure show the current actual engineering documentation link to the SRD. Note: A change to connect a downward line from the top entries into the Hazard Assessment block was described but is not shown on the figure. This change is also acceptable because it shows the flow of requirements into the hazards assessments.
4.2	0	Change “in Part B” to “during design iteration”; change i.e., to e.g.,	C, E	This change is acceptable because it is consistent with deleting reference to Part B from the ISMP as it no longer provides useful information. The editorial change is acceptable because it improves the readability of the ISMP.
4.2.3	0	Change title from “Tailoring of Safety-Related Documentatioin” to “Tailoring of Documentation Related to Safety”	C	This change is acceptable because it is provides clarification of intent.
4.2.3.4	0	Change instances of the verb tenses are and is to will be in this section.	C, E	The verb tense changes are acceptable editorial changes that reflect the TSRs will be prepared for future use.
4.2.3.4	2	Revise the first sentence, to read: “The TSRs, effective during hot commissioning, operations and deactivation, will be based on the FSAR accident analysis assumptions and credited safety functions, and any facility-specific commitments made”.	C, E	This change is acceptable because it clarifies the role of the FSAR and accident analysis assumptions and credited safety functions in TSR development.
4.2.3.5	0	Revise the verb tense and syntax in this section from present tense to future tense.	C	These changes are acceptable because they reflect the future development, role, and scope of the Emergency Plan supporting operations.
Section 5.0 Changes				
5.1	0	Delete the reference to ISAR Section 3.1 at the end of the last paragraph of this section.	C, E	Deleting the reference to the ISAR is acceptable because the referenced information is in the ISMP.

ISMP Section	Rev	Summary Description of Change	Type <sup>2</sup>	OSR Evaluation of Change
5.1	2	Add “(MSDSs)” following Material Safety Data Sheets; add “Part A” before Hazards Analysis Report and before HAR; delete the reference to ISAR 3.1; change “technology” to “design”; add a new statement as follows: “WTP process hazard information will be included in the facility-specific volumes of the PSAR Chapters on Hazard and Accident Analysis, rather than in a stand-alone HAR”.	C, E	The change to add the acronym MSDS is acceptable because it is an editorial change. Adding Part A before the Hazards Analysis Report is acceptable because it makes the discussion specific to the Part A HAR. Deleting the reference to ISAR 3.1 is acceptable because it is superseded by the PSAR Volume I, Chapter 17, Section 17.4.3 on WTP configuration management and the updated section 1.3.16 of the ISMP that details the current WTP Project Configuration Management Program. Changing technology to design is an acceptable editorial change that provides better terminology. The added statement is acceptable because it is appropriate to have the hazard information included in the facility-specific PSAR chapters on Hazard and Accident Analysis.
5.2	0	First paragraph, change “QAP” to “QA Program”. Second paragraph, change “are described” to “are also described”. Change “QAP” to “QA Program”; change “are described” to “are also described”; change “audits” to “assessments”.	C, E	These changes are acceptable because they are either editorial changes for consistency in the ISMP or to improve the readability of the ISMP, or to clarify the correct terminology for more general types of reviews conducted.
5.3	0	Replace the first two sentences in the first paragraph with new text; change “is” to “if required, will be”; delete reference to ISAR 3.1; change “configuration management program database includes” to “Standards Identification Process Database (SIPD) and the Plant Item List (PIL) identify”; change “The database relates” to “these databases relate”.	C, E	Replacing the first two sentences in the first paragraph with new text is acceptable because it provides an updated overview of the Configuration Management Program relative to the WTP Project and the new text reflects the approach presented in the Project Configuration Management Plan. The change to if required, will be is acceptable because it clarifies the role of the Management of Change procedure if PSM is required. Deleting the reference to ISAR 3.1 is acceptable because it is superseded by the PSAR Volume I, Chapter 17, Section 17.4.3 on WTP configuration management and the updated section 1.3.16 of the ISMP that details the current WTP Project Configuration Management Program. The addition of the database and list is acceptable because it specifies what is used to support identification of SDC and SDS SSCs. The change from the database relates to these databases relate is acceptable because it is editorial and grammatically correct.
5.3	2	Change “production operation” to “hot commissioning” at end of item 1.	C, E	The change to hot commissioning is acceptable because it clarifies when the USQ process is needed.
5.4	0	Delete reference to ISAR 3.6	C	Deleting the reference to ISAR Section 3.6 is acceptable because it is superseded by the PSAR Volume I, Chapter 14 reference to the Quality Assurance Manual (QAM) that addresses the Project approach and requirements for audits and assessments.

ISMP Section	Rev	Summary Description of Change	Type <sup>2</sup>	OSR Evaluation of Change
5.5	0	Change “HAZOP reference” to “ISM process as described in SRD Appendix A”; specify Part A HAR (two places); delete the sentence beginning, “This is accomplished by considering...”; change “in Part B” to “during design phase of the Project”; Change “the discussion on schedule for submittals from Figure 9-1” to “the detailed Project ISM schedules”; change “the QAP” to “Project procedures”.	C, E	Changing HAZOP to the ISM process is acceptable because it is consistent with what is described in the SRD Appendix A. Specifying Part A HAR is an acceptable editorial change and is consistent with previously accepted changes. Deleting the sentence is an acceptable change because the sentence is somewhat unclear and slightly redundant with the previous two sentences and adds no value to the discussion. Changing Part B is an acceptable editorial change and is consistent with previously accepted changes. The change to the Figure 9-1 discussion is acceptable because Figure 9-1 has been deleted and the detailed Project ISM schedule is the appropriate place for scheduling the submittals. Changing QAP to Project procedures is acceptable because it clarifies that the PHA is conducted in compliance with Project procedures directly (which is indirectly in compliance with the QA Program).
5.5	2	Revise the first paragraph to include reference to the Project QAM, the SRD, and hazard analysis.	C, E	The change to reference the Project QAM and SRD is acceptable because it clarifies the PHA technique is used in conjunction with the Project QAM and SRD. Including hazard analysis clarifies the technique being chosen.
5.6.2	0	Change “Management of Change” to “ISM implementing”; revise “change” to “configuration”; delete reference to ISAR 3.1 and 4.9	C	The change and revision are acceptable because they specify the requirements for updating the PHA and HAR. Deleting the reference to ISAR Section 3.1 is acceptable because it is superseded by the PSAR Volume I, Chapter 17, Section 17.4.3 on WTP configuration management and the updated section 1.3.16 of the ISMP that details the current WTP Project Configuration Management Program. Deleting the reference to ISAR Section 4.9 is acceptable because it is superseded by the discussion in PSAR Volume I, Section 3.3 on hazards analysis methodology.
5.6.3	0	Delete reference ISAR 3.4	C	Deleting the reference to ISAR Section 3.4 is acceptable because it is superseded by the PSAR Volume I, Chapter 12, Section 12.4 discussion on WTP training.
5.6.4	0	Delete reference to ISAR 3.10	C	Deleting the reference to ISAR Section 3.10 is acceptable because it is superseded by the PSAR Volume I, Chapter 10, Section 10.3 discussion on WTP commissioning.
5.6.5	0	Change “QAP” to “QAM”	C	This change is acceptable because it clarifies that the documentation is provided in the QAM rather than the QAP.
5.6.6	0	Delete reference to ISAR 8.0; delete reference to ISAR 3.11	C	Deleting the reference to ISAR Section 8.0 is acceptable because it is superseded by the PSAR Volume I, Chapter 18 discussion on WTP fire protection. Deleting the reference to ISAR Section 3.11 is acceptable because it is superseded by the PSAR Volume I, Chapter 11, Section 11.3 discussion on WTP conduct of operations.
5.6.7	0	Delete reference to ISAR 3.7	C	Deleting the reference to ISAR Section 3.7 is acceptable because it is superseded by the PSAR Volume I, Chapter 11, Section 11.3.6 discussion on WTP investigation of abnormal events, and Chapter 17, Section 17.4.7 on WTP occurrence reporting.

<b>ISMP Section</b>	<b>Rev</b>	<b>Summary Description of Change</b>	<b>Type<sup>2</sup></b>	<b>OSR Evaluation of Change</b>
5.6.8	0	Delete reference to ISAR 9.0	C	Deleting the reference to ISAR Section 9.0 is acceptable because it is superseded by the PSAR Volume I, Chapter 15 discussion on WTP emergency preparedness.
Section 7.0 Changes				
7.1	0	Delete the second and six paragraphs; add “the Washington State Department of Ecology” before the word Ecology, and put parentheses around the word Ecology; add “(DWPA)” after Application and use the acronym in the following sentence; add sentence as follows: “The DWPA will be completed by BNI and submitted for approval by Ecology”	C	These changes are acceptable because they clarify the regulatory interfaces in the environmental protection area; they delete some historic information on BNFL activities; and they specify that BNI is working to complete the DWPA and will submit it for approval by Washington State Department of Ecology.
7.4	2	Change “operation of the double shell tank AP-106” to “transfer of Hanford Tank Farm waste to the WTP”; change “BNFL to the WTP Contractor”; change “Project Hanford Management Contractor (PHMC)” to “Tank Farms Contractor”	C	These changes are acceptable because they provide a correct and more general reference to the interface between the Hanford Tank Farm and the WTP
Section 8.0 Changes				
8.0	0	Change “safety documents” to “safety information”; change “QAP” to “QA Program”	C	This change is acceptable because it clarifies that not all items in Table 8-1 are safety documents, but all items are safety information. Replacing QAP with QA Program is acceptable because it is consistent with previously accepted changes.

ISMP Section	Rev	Summary Description of Change	Type <sup>2</sup>	OSR Evaluation of Change
Table 8-1	0	<p>In Authorization Basis row,</p> <ul style="list-style-type: none"> <li>• Add “Limited Construction Authorization Request”</li> <li>• Add “Partial Construction Authorization Request”</li> <li>• Add “Hazard Analysis Report”</li> <li>• Delete “Safety analyses”</li> <li>• Change “Quality Assurance Plan and Implementation Plan” to “Quality Assurance Manual”</li> </ul> <p>In Design row, replace “Master Equipment List” with “Plant Item List”</p> <p>In Integrated Safety Analysis row,</p> <ul style="list-style-type: none"> <li>• Change title to “Integrated Safety Management”</li> <li>• Change “Integrated Safety Analyses” to “Integrated Safety Management”</li> <li>• Add “Standard Identification Process Database (SIPD)”</li> <li>• Delete “Initial Safety Analysis Report”</li> <li>• Delete “Hazard Analysis Report”</li> </ul> <p>In Emergency Management row, add “Emergency Management Plan”</p> <p>In Quality Assurance Row add “Deficiency Reports”</p>	C	These changes are acceptable because they reflect additional documentation identified as Safety Basis Records; they reflect Project terminology; and they relocate items from one section to another section.
Section 10.0 Changes				
10.0	0	Change “10 CFR 830.120 (c) (3) (i) and (c) (3) (ii)” to “10 CFR 830 Subpart A”; add the word “commissioning”; delete Section 18 of before the QAM in two places	C	Citing 10 CFR 830, Subpart A is acceptable because that is the currently effective version of 10 CFR 830 applicable to the Project. Adding the word commissioning is consistent with previously approved changes and it reflects assessments during the commissioning phase. Deleting Section 18 is acceptable because that level of specificity is not necessary.

ISMP Section	Rev	Summary Description of Change	Type <sup>2</sup>	OSR Evaluation of Change
Section 12.0 Changes				
12.0	0	Delete two definitions; change “Part B” to “Project detailed design”; update the definition for Graded Approach to match the current wording in 10 CFR 830.3; delete items no longer cited or used in the ISMP; editorial changes	C, E	Deleting the two definitions related to privatization is acceptable because they are no longer applicable. Updating definitions is acceptable because the items are no longer cited or used in the ISMP. Updating the definition for Graded Approach is acceptable because the new definition is consistent with 10 CFR 830.3. The editorial changes are acceptable because they are consistent with changes previously accepted or reflect correct wording.
Section 13.0 Changes				
13.0	0, 2	<p>Add references:</p> <ul style="list-style-type: none"> <li>• 10 CFR 830, Subpart A</li> <li>• BNI 2001b (BNI Letter CCN 021118)</li> <li>• BNI 2001c (BNI Letter CCN 021411)</li> <li>• DOE-RL 2000a (RL/REG-2000-08)</li> <li>• NRC 1998 (NUREG/CR-6410)</li> </ul> <p>Delete references for:</p> <ul style="list-style-type: none"> <li>• 62 FR 8693</li> <li>• BNFL 1998a</li> <li>• BNFL 1998b</li> <li>• DOE 1995a</li> <li>• HRC 1976</li> <li>• ICBO 1994</li> </ul>	E	Adding references is acceptable because it reflects changes made in the ISMP citing those references. Deleting references is acceptable because it reflects changes made in the ISMP that deleted those references.